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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: VOLKSWAGEN “CLEAN  
DIESEL” MARKETING, SALES  
PRACTICES, AND PRODUCTS LIABILITY  
LITIGATION

MDL No. 2672 CRB (JSC)

**STIPULATION AND [PROPOSED] ORDER  
TO ADJOURN INITIAL CASE STATUS  
CONFERENCE**

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### This Document Relates To:

Judge: Hon. Charles R. Breyer

*U.S. S.E.C. v. Volkswagen AG,*  
No. 3:19-cv-1391-CRB

This Stipulation is entered into between Defendant Martin Winterkorn (“Winterkorn”),  
Defendants Volkswagen Aktiengesellschaft, Volkswagen Group of America Finance, LLC, and VW  
Credit, Inc. (“Defendants”), and Plaintiff United States Securities and Exchange Commission  
(together with Defendants, the “Parties”).

1 WHEREAS, on March 21, 2019 the Court issued an order scheduling an initial case status  
2 conference in this action for April 23, 2019 at 10:30 a.m. and a deadline for the parties to submit a  
3 joint written statement in advance of that conference by April 17, 2019;

4 WHEREAS, lead counsel for Defendant Winterkorn is unable to attend a status conference  
5 on April 23, 2019 because of a scheduled oral argument in another, unrelated, matter;  
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7 WHEREAS, the Parties agree that the status conference should be rescheduled; and  
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9 WHEREAS, the Parties have conferred together and with the Court's Courtroom Deputy  
10 Clerk, and have confirmed that the Parties and the Court are available on May 10, 2019 at 10:00  
a.m.;

11 NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED, by and among the  
12 Parties, that, subject to the Court's approval, the initial case management conference shall be  
13 adjourned to May 10, 2019 at 10:00 a.m., when it will be held in Courtroom 6 of the United States  
14 District Court for the Northern District of California, located at 450 Golden Gate Avenue, San  
15 Francisco, CA 94102-3489;

16 IT IS FURTHER AGREED, that, subject to the Court's approval, the deadline for the parties  
17 to submit a joint written statement shall be adjourned to May 3, 2019; and  
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19 IT IS FURTHER AGREED THAT by entering into this stipulation the Defendants do not  
20 waive any of their defenses in this action, including, without limitation, defenses regarding personal  
21 jurisdiction and service;

22 Date: April 3, 2019  
23

24 /s/Christopher J. Stanley  
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22 *Aktiengesellschaft, Volkswagen Group of*  
23 *America Finance, LLC, and VW Credit, Inc.*  
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30 *Attorneys for Plaintiff United States Securities*  
31 *and Exchange Commission*  
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3 PURSUANT TO STIPULATION, IT IS SO ORDERED

4 DATED: April 8, 2019

CHARLES R. BREYER  
United States District Judge

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**ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))**

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the signatories.

Dated: April 3, 2019

## JOSEPH HAGE AARONSON LLC

/s/Christopher J. Stanley  
Christopher J. Stanley (*pro hac vice*)